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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

MAR 26 1991

Federal Communications Commission
Office of the Secretary

In the Matter of:

Telocator Petition for
Rulemaking to Amend Part 22 of
the Commission's Rules Concerning
the Use of 930-931 MHz for an
Advanced Messaging Service

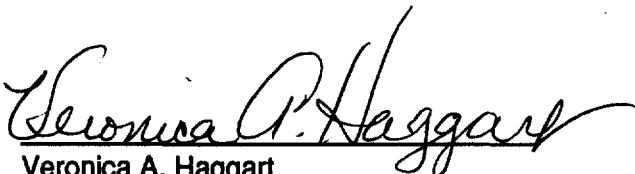
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RM-7617

REPLY COMMENTS

Motorola Inc. ("Motorola") is pleased to submit its reply comments in the above-captioned rulemaking.

Respectfully submitted,



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In its comments, Motorola supported the Telocator petition to make the 930-931 MHz reserve paging spectrum available for an Advanced Messaging Service (AMS). The technology is currently available to make AMS a reality. Motorola's comments described a number of products and services which will figure prominently in this band: portable computers and E-mail, voice messaging and graphics, etc. One example of an early AMS is the nationwide E-mail service which Motorola is currently implementing on its EMBARC network. The spectrum needs to be made available now if these services are to be implemented expeditiously. The 930-931 MHz band occupies a unique role in the development of AMS because of its placement vis-à-vis other paging frequencies. This particular spectrum is vital to AMS development; current paging spectrum is not suitable for the growth of these enhanced messaging services. Finally, it is essential that the United States retain its technological leadership in paging and messaging services by making this spectrum available.

The other commenting parties were quite supportive of the Telocator petition to make the 930-931 MHz reserve paging band available for Advanced Messaging Service. The petition is closely linked to what the public demands and will use if given the opportunity. The comments provide specific illustrations which show the tremendous level of commitment to the implementation of AMS.

Other manufacturers also discussed advanced messaging products and technology innovations which they are already bringing to market and which will depend, for their success, on the availability of separate spectrum for Advanced Messaging Services. See for example, the comments of Metriplex, describing its current provision of hardware and software for enhanced information services via alphanumeric paging, and the future increased demand for large volume data transfer and graphics transmissions. These trends point to the "... strong need

for a dedicated allocation for messaging and information services, as opposed to traditional beeper services". Metriplex listed and discussed five different AMS services currently under development.

Similarly, Real Time Strategies supported the petition as a necessary vehicle for bringing state of the art communications capabilities to service providers. This manufacturer pointed out that the 930-931 MHz allocation is needed in order to bring one of its own innovative products to market, a product to increase the volume of alphanumeric pagers messages to radio paging systems. The product would permit a wireless capability for forwarding messages to hand-held data entry devices. The allocation will be necessary in order to encourage other manufacturers to invest in such a feature.

In a related vein, McCaw Cellular Communications (Paging Division) referred to an innovation in alphanumeric paging which it developed for the Goodwill Games. The success of this experience further illustrated the market acceptance of and substantial demand for the new AMS, which will depend on the requested allocation.

The comments also characterized the use of this spectrum for AMS as a "natural progression": This one megahertz is contiguous to existing paging spectrum. Metriplex observes that the current one-way radiopaging infrastructure has paved the way for the emerging Advanced Messaging Services. These latter services can now be offered on a commercially successful basis if the spectrum is made available. Similarly, the Land Mobile Communications Council (LMCC) characterizes AMS as the natural evolution of paging which the Commission envisioned in 1982 when it reserved the one MHz band between two paging allocations. Additionally, MTel supported the allocation as consistent with the Commission's

original rationale in placing the paging spectrum in reserve. Mtel, which has experienced phenomenal public acceptance of its nationwide paging service network, foresees even greater demand for enhanced messaging features and emphasizes the limitations in attempting to bring these advances to the public on existing paging spectrum.

In view of the unique placement of this spectrum and the solid commitment of carriers, manufacturers, and the public to the near-term development of Advanced Messaging Services, the public interest would be better served by allocation of the 930-931 Mhz band for AMS. In its comments, Northern Telecommunications indicated its support of this spectrum's allocation for Personal Communications Service. Like Northern Telecommunications, Motorola strongly supports the advancement of PCS, both in this country and globally. At the same time, we also support the expansion of personal communications through the very important channels such as classic one-way paging. For many users, these low-cost one-way capabilities have been vital to enhancing productivity and efficiently meeting their communications needs. AMS is an extremely important advancement in this area and will be in heavy demand by the public. The 930-931 MHz band is uniquely responsive to this growing need and should be made available.


Finally, the comments echo an additional point which Motorola made in its filing: the United States should maintain its competitive communications edge by developing a nationwide capability of Advanced Messaging Service. See comments of Metriplex. Our productivity will be enhanced domestically, and we will be able to export our technological leadership. If we do otherwise, the leadership will surely be assumed by interests in other countries which perceive already the significance of the evolving AMS and are taking steps to make spectrum available for its rapid implementation.

CONCLUSION

The comments strongly support the Commission's allocation of the paging reserve spectrum at 930-931 MHz for an Advanced Messaging Service. The public is prepared to accept these services and will use them increasingly as soon as they become available. This band is uniquely suited for AMS implementation, as evidenced by the specific examples provided by the commentors. The allocation will also enable this country to maintain its leadership role in technology innovation related to telecommunications in general and to advanced messaging in particular.

CERTIFICATE OF SERVICE

I, Alice M. de Séve, a secretary with Motorola Inc., do hereby certify that on this 26th day of March, 1991 a copy of the foregoing "Comments" was sent to each of the following by first-class mail, postage-prepaid except where service by hand is indicated(*):



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